



**January 27, 2021**

**Testimony submitted to the Connecticut State Transportation Committee**

**In SUPPORT of:** H.B. 5429

**In SUPPORT of:** S.B. 261

This testimony is offered on behalf of both AAA clubs in Connecticut, AAA Allied Group and AAA Northeast, which collectively represent over a million members statewide.

AAA supports the intent of H.B. 5429 – to make streets safer for all road users – and many of its provisions. We would like to respectfully suggest modifications to select provisions to improve their ability to enhance traffic safety.

**Speed Camera Enforcement in School Zones and Work Zones**

AAA recognizes the role that automated speed enforcement can play in keeping our roads safe, particularly for vulnerable road users. However, we also know that these programs can be abused and serve more as a revenue source for municipal budgets than as a genuine traffic safety initiative.

Thus, AAA supports automated speed camera programs that are supplemented with engineering measures, educational campaigns, and traditional law enforcement, provided that thorough evaluations are regularly conducted and disclosed to the public.

H.B. 5429 includes laudable provisions that aim to keep the program fair. It mandates warning signs and requires the citation to be mailed within 10 days, ensuring that drivers have fair warning before getting a speed camera ticket and receive any tickets expeditiously.

However, we believe that additional provisions are necessary to ensure the programs operate as safely, fairly, and transparently as possible. They include:

**Warning Period:** Implementation of automated enforcement cameras should be accompanied by a probationary period (e.g. 30 days) when only warnings are issued. A warning period allows drivers to change their behavior without receiving a ticket and allows municipalities to sort out any operational problems before tickets are issued. For school zone speed cameras, warnings should be given out for each new camera that is installed.

**Reinvest revenue in traffic safety:** Automated enforcement programs fail when they become revenue raisers first and foremost, with safety an afterthought. In Nassau County on Long Island, a school zone speed camera program was ended after six months because the public perceived it as aiming to generate revenue rather than trying to keep the roads safe. To fully prioritize safety, this legislation should require that revenue above the costs to operate the camera program be used to fund traffic safety initiatives.

**Require crash data to be considered:** The bill does not give any guidance to municipalities on how to select camera sites. To ensure that deterring crashes, not simply generating tickets, is the priority, it should require that municipalities consider speed data, crash history, and roadway geometry in selecting a speed camera location – as New York does.

**Public education campaign:** This legislation wisely requires the DOT to undertake a work zone safety awareness campaign to accompany work zone speed cameras. It should also require any municipality that operates a school zone speed camera program to first undertake a public education campaign about the cameras and the importance of following school zone speed limits.

**Annual evaluation:** The legislation currently requires an annual audit of compliance with privacy regulations, and an annual report about the number of recorded events and the number of times information has been disclosed pursuant to a search warrant or subpoena, but no regular evaluation of the safety impacts of the cameras. The bill should require such an evaluation to be done annually, be submitted to the General Assembly, be made available to the public on the municipality's (or DOT's) website, and include:

- Before-and-after crash data for each school zone with a camera (or in the aggregate for work zones)
- The number of violations recorded by each camera for each month such camera has been operable
- A list of other engineering and educational measures taken to improve safety in the school zones with cameras
- Adjudication data, including the number of appeals filed and number of guilty or not guilty dispositions
- The amount of revenue earned from camera tickets and the cost of operating the cameras

**Open data:** This bill only allows aggregate data to be shared with researchers; it should explicitly authorize the creation of an open data portal that lists the time, date, and location of each violation, as well as the speed of the vehicle, the applicable speed limit, and the vehicle's state of registration. This will allow safety advocates to analyze trends in camera enforcement and uncover particularly unsafe roads or times of day where additional measures may be needed to maximize safety.

**Clarify recording permissions:** The bill seems to require the cameras to only take pictures of the license plate of a vehicle and not capture any other vehicles. This requirement may be unworkable, given how the cameras take multiple pictures and sometimes record video of the speeding car to capture the violation. The cameras should still be positioned not to take photos of occupants or contents of the vehicle, but video recordings of alleged violations should be allowed – video is the best way to convince skeptical drivers that they indeed committed an infraction.

With these additions, Connecticut can set a model policy for legislative authorization of speed camera enforcement and ensure that safety, not revenue, is prioritized.

## **Dooring**

AAA supports section 4 of H.B. 5429, which prohibits vehicle occupants from opening their car doors into moving traffic. This provision particularly enhances the safety of bicyclists, who are especially vulnerable if a car door is opened in their path. AAA would be happy to help work with the Department of Transportation to educate drivers and passengers about this provision's importance should it be enacted.

We respectfully suggest one amendment to subsection (c), which prohibits leaving a car door open adjacent to moving traffic except to load or unload passengers. This provision is reasonable, but subsection (a) defines "moving traffic" to include pedestrians walking on a sidewalk. Thus, the law would make it illegal to leave a door open adjacent to a sidewalk. Such behavior, while perhaps not advisable, poses little danger to others, provided that the door was opened in a safe manner, and should not be penalized with an infraction. Additionally, the provision does not exempt the unloading of goods. The bill would be improved by excluding sidewalks from the definition of moving traffic specifically for subsection (c).

## **Vision Zero Council**

AAA supports section 2 of H.B. 5429, which creates a Vision Zero Council. AAA recently wrote to President Biden, asking that he commit to reducing roadway fatalities to zero by 2050, and supports Connecticut's efforts to achieve the goal of zero fatalities or serious injuries.

To enhance the strength of this provision, AAA suggests that the goal have a specific timeframe, so that political and agency leaders can form a more concrete action plan.

### **Online Driver Education**

AAA also supports sections 12 and 25 of S.B. 261, which allow driver education to be taught via distance learning. During the pandemic, AAA has virtually taught driver education to hundreds of students, to positive reviews from parents and students, and supports making this a permanent option.

AAA also has created an e-learning driver education module, How to Drive Online, that is offered in other states. It allows students whose schedules may not permit a regularly scheduled session to get the necessary education about safe driving in a professional, engaging manner – which is preferable to having those individuals age out of the graduated driver licensing laws before they obtain a license. This legislation would appear to allow the Department of Motor Vehicles to authorize such a program regulatorily, should they choose, but we would also welcome specific language that provides for online learning via e-modules.

Allowing classroom, virtual classroom, and online learning will enhance access to driver education for a wide variety of students, and AAA supports efforts to support all such options.

Thank you for your time and consideration.

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